

EXHIBIT E

Mar. 28. 2007 6:35PM

No. 0088 P. 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

AGERE SYSTEMS, INC. et al.,

Plaintiff,

v.

ADVANCED ENVIRONMENTAL
TECHNOLOGY CORPORATION, ET AL.,

Defendants.

Civil Action No. 02-CV-3830

**CONTENTION INTERROGATORIES OF DEFENDANT
CARPENTER TECHNOLOGY CORPORATION**

Pursuant to the Federal Rules of Civil Procedure Carpenter Technology Corporation ("Carpenter") requests that Plaintiffs respond to the following Contention Interrogatories within thirty (30) days from the date hereof.

I. DEFINITIONS

Carpenter incorporates by reference the Definitions set forth in Defendants' Joint Contention Interrogatories to Plaintiff. As used herein, the term "Ashland" refers to Carpenter, named as a Defendant in this action and designated by Plaintiff as "Ashland Chemical Company."

II. INTERROGATORIES

1. Carpenter incorporates by reference as if fully set forth herein the Defendants' Joint Contention Interrogatories to Plaintiffs and any Contention Interrogatories served by individual defendants.
2. Plaintiffs contend that Carpenter disposed of drummed waste at the Site?
3. Do Plaintiffs contend that Carpenter's bulk waste was disposed of at the Site?
4. Where on the Site do Plaintiffs contend that Carpenter bulk wastes were disposed?

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5. Do Plaintiffs contend that any of Carpenter's bulk waste was alleged to be disposed of at the Site was disposed prior to June 12, 1973 or after May 3, 1974. If so, state the basis why and identify all documents and witnesses that support this contention.

6. Do Plaintiffs contend that Carpenter's bulk waste alleged to have been disposed of at the Site contributed to the need for Remedy Component 1 of OU-2, Soil Aeration and Treatment of VOC Hot Spots; or Component 2 of OU-2?


a. If so, state the factual basis for this contention.

7. Do Plaintiffs contend that the total clean up cost of the Site would not have been necessary but for the disposal of Carpenter's waste allegedly disposed of at the Site?

8. Do Plaintiffs contend that groundwater data from the Site supports the contention that acid wastes allegedly disposed of on the Site could have affected metal transport in the areas of the Site down gradient of the disposal source area?

- a. all facts upon which Plaintiff relies in support of such contention;
- b. the identity of all documents upon which Plaintiff relies in support of such contention.

Dated: March 28, 2007



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